

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: COLOPLAST CORP. PELVIC SUPPORT SYSTEMS PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02387 MDL No. 2387
THIS DOCUMENT RELATES TO: <i>ALL COLOPLAST WAVE 5, 6 AND 7 CASES</i>	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

SECOND AMENDED NOTICE OF DEPOSITION OF BRUCE ROSENZWEIG, M.D.

PLEASE TAKE NOTICE that Defendant Coloplast Corp. (“Coloplast”), by and through undersigned counsel, will take the deposition of Bruce Rosenzweig, MD, on Thursday, May 2, 2019, commencing at 8:00 a.m. (CDT), at the law offices of King & Spalding LLP, 444 W. Lake Street, Suite 1650, Chicago, IL 60606, before a Notary Public or some other officer authorized by law to administer oaths in the State of Illinois and shall continue from day to day until completed. The deposition will be recorded stenographically by Golkow Technologies, 1650 Market Street, Suite 5150, Philadelphia, Pennsylvania 19103, and is to be taken pursuant to the Federal Rules of Civil Procedure, the procedures set forth in MDL 2387, *In Re: Coloplast Corp. Pelvic Support Systems Products Liability Litigation*, and other applicable laws, and is for all lawful purposes.

Please take further notice that pursuant to Rules 30 and 34 of the Federal Rules of Civil Procedure, deponent is requested to produce at his deposition any document reviewed prior to the commencement of the deposition to prepare for the deposition and/or to refresh the deponent’s recollection regarding the facts of this case, as well as the documents and other tangible items requested in the attached **Exhibit A**.

Dated: April 30, 2019

Respectfully submitted,

/s/ Lana K. Varney

Lana K. Varney

KING & SPALDING LLP

500 West 2nd Street, Suite 1800

Austin, TX 78701

512.457.2060 (phone)

512.457.2100 (fax)

lvarney@kslaw.com

Attorneys for Defendant Coloplast Corp.

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2019, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Lana K. Varney

Lana K. Varney

EXHIBIT A

Coloplast hereby requests that Bruce Rosenzweig, MD produce at his deposition the documents and tangible items listed below:

DEFINITIONS

1. “Document” means every written, recorded, or graphic material of any kind and description, whether prepared by you or any other person, including but not limited to correspondence, memoranda, tapes, stenographic or handwritten notes, studies, publications, writings, graphs, charts, books, pamphlets, pictures, drawings or photographs, films, microfilms, voice recordings, maps, reports, surveys, minutes, or statistical compilations, other data compilations from which information can be obtained (translated, if necessary, by you into reasonably usable form), and any other material or information within the scope of the request. Every draft or non-identical copy of a document is a separate document as defined herein.
2. “You,” “your,” and “yourself” refers to Bruce Rosenzweig, MD and anyone acting on his behalf.

DOCUMENTS REQUESTED

1. A copy of the witness’s current resume or Curriculum Vitae.
2. A list of publications authored by you in the previous 10 years, if not included on your Curriculum Vitae.
3. A list of cases in which you have testified as an expert during the past four years, either at trial or in deposition, if not included on your Curriculum Vitae.
4. A complete copy of your file on this case, including, but not limited to, all published and unpublished literature, documents, and data considered by you in formulating any opinions offered in this case.
5. All correspondence or other written communications in any form between you and Plaintiffs or their attorneys, to the extent that such communications:
 - a. Relate to your compensation;
 - b. Identify facts or data that you were provided and that you considered in forming your opinions; or
 - c. Identify assumptions that Plaintiffs’ counsel provided you and that you relied on in forming your opinions.

6. Any and all documents, including but not limited to billing statements, billing records, employee records, time sheets, and/or invoices, that reflect the amount of time spent or amount of compensation received for any of your work relating to female pelvic mesh litigation, including any retainer that you have requested or been paid.
7. All final reports and/or writings that you have prepared concerning this case.